

STATEMENT OF INVESTMENT PHILOSOPHY

INTRODUCTION

The Nebraska Investment Council (“NIC”) has been empowered by Neb Rev. Stat. § 72-1239.01 to act as fiduciary on behalf of the State’s Retirement Plans, Operating Investment Pool, College Savings Plan, and other Trusts and Endowments. The mission of the NIC is as follows:

It is the mission of the Nebraska Investment Council to prudently manage the funds entrusted to us by the people of the State of Nebraska. We deliver investment management services to provide direct financial benefit exclusively to the owners of these funds. We are committed to thorough, sound, and informed analysis in order to achieve superior returns while maintaining prudent levels of risk.

PURPOSE

The NIC has developed this Statement of Investment Philosophy to provide clear articulation of the NIC’s long-term investment philosophy regarding return and risk objectives for the various investment pools to which the NIC has fiduciary obligations.

INVESTMENT PHILOSOPHY

The guiding philosophy is to allow sufficient flexibility in the management process while maintaining reasonable parameters to ensure prudence and care in the execution of the investment program. The NIC will comply with all existing and future applicable State and Federal regulations and will administer its duties solely for the benefit of the plan participants and State agencies with the care, skill, prudence and diligence under the prevailing circumstances that a prudent expert acting in like capacity and familiar with such matters would use in the conduct of an enterprise of like character, purposes and aims.

The NIC believes that its long-term investment objectives will be achieved through emphasizing equity-oriented investments and through prudent management of those risks which do not offer sufficient long-term rewards. Thus, investment strategies will be developed to provide consistent value-added relative to relevant market-based benchmarks and will incorporate effective risk controls. The NIC’s investment philosophy is based upon a set of factors that have widely accepted theoretical and empirical bases.

1. Asset allocation has the most significant impact on investment results. The NIC will focus significant efforts on the development and maintenance of asset allocation strategies that will optimally fulfill investment objectives.
2. Some markets are efficient while others are less so or inefficient. Investment strategies will reflect a mix of active and passive investments, with passive investments being emphasized in the more efficient markets.
3. Capital markets revert to the mean over long-time periods. Investment strategies will generally be long-term in nature and will avoid ad hoc decision-making based upon short-term factors.
4. Costs have a meaningful impact on returns. Investment strategies will utilize cost effective approaches.
5. Valuation and analysis based upon fundamentals generally produce superior return/risk results. Investment strategies will focus on fundamentally-based processes.

6. Performance measurement and monitoring activities provide assessment of success of the NIC's investment strategies and implementation of those strategies. Clear, unambiguous market-based benchmarks will be selected for each investment strategy. Performance reviews of all investment strategies will be conducted at least annually.
7. When hiring investment managers, the Council prefers to utilize Nebraska-based investment advisers licensed by the State of Nebraska as long as the manager satisfies the criteria, State statutes, etc., established for the selection process.
8. In order to achieve prudent diversification in the Defined Benefit Plans, the Cash Balance Benefit, the General Endowment Funds and the Health Care Endowment, the maximum target allocation that will be allowed to any one active equity investment manager is 10% of the total portfolio, except in unusual, and most likely temporary circumstances.
9. No contributions of any kind will be made to the portfolios of investment managers in the Defined Benefit Plans, the Cash Balance Benefit, the General Endowment Funds and the Health Care Endowment which are on the Council's watch list. An index fund corresponding to the specific mandate of the manager on watch will be used for the contributions instead.

DESCRIPTION OF ASSETS

The assets to which this Statement of Investment Philosophy applies are defined as follows:

- 1) Defined benefit plans
 - a) The School Retirement System
 - b) The State Patrol Retirement System
 - c) The Judges' Retirement System
- 2) The State Employees Retirement System of the State of Nebraska
 - a) Defined Contribution
 - b) Cash Balance Benefit
- 3) The Retirement System for Nebraska Counties
 - a) Defined Contribution
 - b) Cash Balance Benefit
- 4) The State of Nebraska Deferred Compensation Plan
- 5) College Savings plans
 - a) College Savings Plan of Nebraska
 - b) AIM College Savings Plan
- 6) Operating Investment Pool
- 7) Trusts and Endowments
 - a) Health Care Endowment Fund
 - b) Permanent School Fund
 - c) Cultural Preservation Endowment Fund
 - d) Nebraska Veteran's Aid Fund
 - e) Agricultural College Endowment Fund

- f) Nebraska Environmental Endowment Fund
- g) State College Endowment Fund
- h) Bessey Memorial Fund
- i) Agricultural Development Fund
- j) Aeronautics Fund
- k) Joseph J. Soukup Fund
- l) Excess Liability Fund
- m) Department of Environmental Quality Fund

Approved August 6, 2003

Last Revision March 29, 2005